

**FILED**

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Clerk, U.S. District Court  
District Of Montana  
Great Falls

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**ATTORNEY FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**CHERI CRUZ GRANBOIS,  
ELMARIE AMELIA WEEKS,  
DYLAN TROY JACKSON,  
LAVANCHIE PATRICIA GOODBIRD,  
KAYLEE JADE JACKSON, and  
PATTI JO ANNUNCIATA MAIL,**

**Defendants.**

**CR 22-*71*-GF-BMM**

**INDICTMENT**

**KIDNAPPING OF AN INDIVIDUAL  
UNDER 18 (Count 1)**  
Title 18 U.S.C. §§ 1153(a), 1201(a),  
(g), and 2  
(Penalty: Mandatory minimum 20  
years to life imprisonment, \$250,000  
fine, and not less than five years to  
lifetime supervised release)

**ASSAULT RESULTING IN  
SERIOUS BODILY INJURY  
(Count 2)**  
Title 18 U.S.C. §§ 1153(a), 113(a)(6),  
and 2  
(Penalty: Ten years of imprisonment,  
\$250,000 fine, and three years of  
supervised release)

**ASSAULT RESULTING IN  
SUBSTANTIAL BODILY INJURY  
TO A MINOR (Count 3)**  
Title 18 U.S.C. §§ 1153(a), 113(a)(7),  
and 2  
(Penalty: Five years of imprisonment,  
\$250,000 fine, and three years of  
supervised release)

**THE GRAND JURY CHARGES:**

**COUNT 1**

That on or about September 15, 2021, in Wolf Point, within Roosevelt County, in the State and District of Montana, and within the exterior boundaries of the Fort Peck Indian Reservation, being Indian Country, the defendants, CHERI CRUZ GRANBOIS, ELMARIE AMELIA WEEKS, DYLAN TROY JACKSON, LAVANCHIE PATRICIA GOODBIRD, KAYLEE JADE JACKSON, and PATTI JO ANNUNCIATA MAIL, all of whom are Indian persons, intentionally and unlawfully seized, confined, inveigled, kidnapped, abducted, carried away, and held Jane Doe, for ransom, reward, and otherwise, and aided and abetted the same, in violation of 18 U.S.C. §§ 1153(a), 1201(a), and 2.

At the time of the offense, Jane Doe had not yet attained the age of 18 years old, and the defendants, as identified above, had each attained 18 years of age, and do not have a relationship with Jane Doe as defined under 18 U.S.C. § 1201(g)(1)(B).

COUNT 2

That on or about September 15, 2021, in Wolf Point, within Roosevelt County, in the State and District of Montana, and within the exterior boundaries of the Fort Peck Indian Reservation, being Indian Country, the defendants, CHERI CRUZ GRANBOIS, ELMARIE AMELIA WEEKS, DYLAN TROY JACKSON, LAVANCHIE PATRICIA GOODBIRD, and PATTI JO ANNUNCIATA MAIL, all of whom are Indian Persons, intentionally assaulted Jane Doe, said assault resulting in serious bodily injury, and aided and abetted the same, in violation of 18 U.S.C. §§ 1153(a) and 113(a)(6).

COUNT 3

That on or about September 15, 2021, in Wolf Point, within Roosevelt County, in the State and District of Montana, and within the exterior boundaries of the Fort Peck Indian Reservation, being Indian Country, the defendants, CHERI CRUZ GRANBOIS, ELMARIE AMELIA WEEKS, DYLAN TROY JACKSON, LAVANCHIE PATRICIA GOODBIRD, and PATTI JO ANNUNCIATA MAIL, all of whom are Indian persons, intentionally assaulted Jane Doe, an individual

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who had not attained the age of 16 years, said assault resulting in substantial bodily injury, and aided and abetted the same, in violation of 18 U.S.C. §§ 1153(a), 113(a)(7), and 2.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal

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FOREPERSON



JESSE A. LASLOVICH  
United States Attorney



CYNDEE L. PETERSON  
for Criminal Chief Assistant U.S. Attorney